

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Rules and Regulations Implementing	)	
Minimum Customer Account Record	)	CC Docket No. 02-386
Exchange Obligations on All Local and	)	
Interexchange Carriers	)	

**COMMENTS OF NEUSTAR, INC.**

NeuStar, Inc. (“NeuStar”) submits the following comments in response to the Federal Communications Commission’s (“Commission”) Further Notice of Proposed Rulemaking (“FNPRM”) in the above-captioned proceeding.<sup>1</sup> In the FNPRM, the Commission requests comment on issues related to whether it should require all local service providers to participate in the exchange of customer account information, and if so, what information local service providers should be required to supply. NeuStar operates a centralized clearinghouse to allow local service providers to efficiently exchange customer service provisioning information, according to industry standards, including customer account information. As a neutral third party provider facilitating the exchange of information between multiple service providers, NeuStar is in a unique position to comment on the efficiencies, timeliness and accuracy of exchanging

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<sup>1</sup> *Rules and Regulations Implementing Minimum Customer Account Record Exchange Obligations on All Local and Interexchange Carriers*, Further Notice of Proposed Rulemaking, CG Docket No. 02-386 (rel. Feb. 25, 2005) (“FNPRM”).

customer account information.<sup>2</sup> In these comments, NeuStar discusses the various features and advantages associated with use of a clearinghouse for information exchange transactions.

## INTRODUCTION

Through the Alliance for Telecommunications Industry Solutions (“ATIS”), Ordering and Billing Forum (“OBF”), the industry has generated standards for the exchange of customer account information between local service providers through a Local Service Request (“LSR”) Preorder transaction. This transaction, known as a customer service record (CSR) query, or Transaction Type ‘E’ of an LSR Preorder, enables a local service provider to request elements of an existing CSR from another local service provider. Such transactions tend to involve requests from competitive local exchange carriers (CLECs) to incumbent local exchange carriers (ILECs). In order to facilitate these types of transactions, NeuStar operates a centralized clearinghouse system that supports this type of transaction, among others, and enables multiple local service providers to generate such requests to and receive related responses from multiple trading partners.

LSR Preorder refers to a set of standards used to facilitate the advance exchange of local service related information between local telephone service

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<sup>2</sup> NeuStar limits its comments to a discussion of the efficiencies gained through use of an information exchange clearinghouse and does not comment on whether the Commission should implement mandatory standards.

providers, prior to the creation by one local service provider of an LSR to order selected wholesale services from and/or migrate a customer's service and/or telephone number from another service provider. It includes critical information necessary to ensure accuracy of the LSR order and minimize recycling, which causes provisioning delays and inefficiencies. The need for such transactions arose after the passage of the Telecommunications Act of 1996, as competition in the local exchange service market allowed customers the ability to select a local service provider of their choice.

The support of LSR Preorder transactions is currently largely limited to ILECs. CLECs can access these transactions either through web based graphical user interfaces ("GUIs") provided by the ILEC or via electronic interfaces such as Electronic Data Interchange ("EDI"). These exchanges require that connectivity and interface agreements be established between each of the affected providers.

### **LSR Preorder Implementation, Quality and Timeliness**

Two of the greatest expenses involved in the exchange of customer service information between local service providers involve the implementation of individual carrier interfaces and the ongoing tracking and implementation of changes in carrier interface requirements. A clearinghouse model is designed to allow a carrier to access multiple other carriers through a single interface to the clearinghouse. By affecting the exchange of information through a clearinghouse, a carrier need only maintain one interface, greatly reducing the cost. Without the central hub provided by a clearinghouse, maintenance of

information exchange between carriers can be difficult, because LECs with automated interfaces continually make changes and improvements to their interfaces. Tracking changes over multiple interfaces can be a logistical challenge for any carrier, let alone a small carrier with limited resources. A clearinghouse can absorb this work by acting as the carrier's single interface.<sup>3</sup>

The ability to accommodate multiple interfaces as well as the validation and tracking capabilities of a clearinghouse ensure that information exchange conforms to quality and timing standards. A clearinghouse validates all incoming data to ensure it is complete and in conformance with OBF standards before forwarding it to the receiving carriers. A clearinghouse also tracks all incoming and outgoing messages to ensure carriers meet agreed upon timing standards. Assisting the carriers in such a manner will reduce message rejects and resends, helping both sending and receiving carriers to avoid the associated costs and delays of each.

A clearinghouse can assist carriers who do not have the ability to support LSR Preorder transactions in an automated manner by providing a common front end to the carrier for purposes of the receipt and management of requests

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<sup>3</sup> The NeuStar Clearinghouse offers carriers a single interface solution to exchange LSR Preorder information. Rather than carriers establishing direct interfaces to each and every provider, participating members route all LSR Preorder transactions through NeuStar, which is then passed to intended trading partners. NeuStar offers members various transmission options including an XML over SOAP API or NeuStar's web based Graphical User Interface.

for customer service information from other service providers, either via a GUI or an electronic interface such as EDI or an Application Programming Interface (“API”). The GUI also can enable receiving carriers for which volumes do not justify intensive development of an automated system to view requests and manually enter responses while the originating carrier can generate the request and accept the response in a standard automated format and not have to decipher hand-written faxed messages.

A clearinghouse’s ability to train carriers in the implementation and operation of LSR Preorders, to validate and track the quality and timeliness of information, and to provide a central, single interface for carriers of various levels of technical sophistication, greatly enhances a carrier’s ability to meet its customer account information exchange obligations in a timely and cost effective manner.

## **CONCLUSION**

The exchange of customer account information is currently supported by industry standard LSR Preorder transactions which are included in the services offered by NeuStar’s Clearinghouse, and are in fact, used today by NeuStar’s CLEC customers when requesting such information from ILECs. This capability could be expanded to support such exchange of customer account information between all Local Service Providers. Such a model minimizes the burden on all carriers of exchanging such information.

In the event that the FCC deems it appropriate to require the exchange of customer account information between all local service providers, NeuStar would

be pleased to work with the appropriate industry forums and local service providers to offer such a solution.

Respectfully submitted,

/s/\_\_\_\_\_  
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